

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF PENNSYLVANIA**

ANACLETO APOLINAR, on behalf of himself and all others persons similarly situated,

Plaintiff,

v.

TAQUERIA SAINT MARKS PLACE, INC., PHILLIP BARRAZA and ANDREA BARRAZA,

Defendant.

Case No.: 1:24-cv-05304-JGK

and Order

STIPULATION OF CONFIDENTIALITY

IT IS HEREBY STIPULATED AND AGREED, by and between the attorneys for ANACLETO APOLINAR (“Plaintiff”) and the attorneys for TAQUERIA SAINT MARKS PLACE INC., PHILLIP BARRAZA AND ANDREA BARRAZA (collectively, “Defendants”) that:

1. Any documents produced by Defendants and/or Defendants’ counsel to Plaintiff and/or Plaintiff’s counsel marked “Confidential – For Settlement Purposes Only” (the “Confidential Discovery”), must be kept confidential and cannot be used for any purpose other than for settlement discussions.
2. Plaintiff and Defendants agree that the Confidential Discovery cannot be used as evidence in any current or future action, or submitted or filed in any arbitration, agency proceeding, or Court, unless otherwise produced or required to be produced by Defendants during discovery of such action.

3. Confidential Discovery shall not be disclosed by the receiving party to any person except Plaintiff and Plaintiff's counsel.

4. Upon the conclusion of settlement negotiations and/or upon the request of Defendants' counsel, the Confidential Discovery and any copies thereof shall be promptly returned to Defendants' counsel or certified as destroyed.

IT IS FURTHER STIPULATED AND AGREED that this Stipulation may be executed in counterparts with scanned PDF or facsimile signatures treated as originals.

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Attorneys for Defendants

Dated: November 19, 2024

Dated: November 19, 2024

SO ORDERED:

Dated: _____
New York, New York

JOHN G. KOELTL, U.S.D.J.

This order is not binding on the Court or Court personnel. The Court reserves the right to amend it at any time. So ordered.
11/21/24 John G. Koeltl
U.S.D.J.